

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$6,163.00 IN U.S. CURRENCY,

Defendant *In Rem*.

Civil No.:

VERIFIED COMPLAINT FOR FORFEITURE IN REM

TO THE HONORABLE COURT:

COMES NOW, the United States of America brings this Verified Complaint for Forfeiture *In Rem* pursuant to Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

Nature of the Action

1. This is a civil action *In Rem* pursuant to 21 U.S.C. § 881(a)(6) (“The following shall be subject to forfeiture to the United States and no property right shall exist in them: . . . (6) All moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter.”).

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over an action commenced by the United States, pursuant to 28 U.S.C. § 1345; over an action for forfeiture, pursuant to 28 U.S.C. § 1355; and over this particular action, pursuant to 21 U.S.C. § 881(a)(6).

3. Venue is proper in this district and the Court has *In Rem* jurisdiction over the defendant currency, pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b), because the acts and omissions giving rise to the forfeiture occurred in this district.

The Defendants in Rem

4. The Defendant *In Rem* is \$6,163.00 in US Currency, seized on August 27, 2024, from Lenin Rene González-Peña and his wife Yolimar Santana-Rivera residence in Urb. Estancias El Rocio, 14 Alborada, Carretera 604 Km. 3.1 Bo. Tierras Nuevas, in Manati, Puerto Rico, 00674, during the execution of an arrest warrant and a search and seizure warrant.

5. The Defendant *In Rem* is within the possession, custody, or control of the United States.

Facts

6. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Special Agent Dowling J. Lugardo of the Federal Bureau of Investigation.

Claim for Relief

7. The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendant *In Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendant *In Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 27th day of January, 2025.

W. Stephen Muldrow
United States Attorney

/s/ Juan Carlos Reyes-Ramos
USDC/PR Bar # G01510
Assistant United States Attorney
United States Attorney's Office
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VERIFIED DECLARATION

I, Juan Carlos Reyes-Ramos United States Attorney, declare pursuant penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the Federal Bureau of Investigation (FBI); that everything contained therein is true and correct to the best of my knowledge and belief.


Executed in San Juan, Puerto Rico, this 27th day of January, 2025.

/s/ Juan Carlos Reyes-Ramos
Assistant United States Attorney

VERIFICATION

I, Dowling J. Lugardo, depose and say that I am a Special Agent with then Federal Bureau of Investigation and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *In Rem* and, pursuant to 28 U.S.C. § 1746, verify pursuant to penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 27th day of January, 2025.

DOWLING LUGARDO  Digitally signed by
DOWLING LUGARDO
Dowling J. Lugardo, Special Agent
Federal Bureau of Investigation (FBI)